

From: [McGuire, Robert \(USATNM\)](#)
To: [Rascoe Dean](#); [Sean Hecker](#); [Jenna Dabbs](#); [David Patton](#)
Cc: [Warren, Jacob \(NSD\)](#); [Eason, Chris \(USATXE\)](#); [Franker, Jeremy \(CRM\)](#); [Harley, Jason \(USAOKW\)](#)
Subject: Discussions
Date: Sunday, July 13, 2025 2:53:26 PM

All –

I wanted to cover a couple of issues in this email. First, we've talked about the trial dates you all proposed and think that 1/27, 2/3, 2/10, or 2/17 (all in 2026) work for us. We'd plan to recommend those dates to the Court at the hearing on Wednesday.

Second, I understand that we've started to provide discovery (at least based on the email traffic between our paralegals and members of your team) and we'll continue to provide materials as we receive them. Let me know if there are any issues with the initial production so we can get that sorted out. I expect Judge Crenshaw will want to hear a discovery update on Wednesday.

Finally, here in MDTN, we customarily make a plea agreement offer in a case at the time we provide discovery. In this case, if the Defendant pleads guilty to the indictment, what makes the most sense to us is what we call here an "open" plea where both sides would be able to recommend whatever sentence they think is appropriate. We would recommend all three points for acceptance at this time but reserve the right to not seek the third point as the case continues and the closer that we get to trial. We are open to discussing guideline applications to see if we can find an agreement via 11(b)(1)(B) to jointly recommend guideline applications. Part of the reason for this email is to open plea discussion dialogue within, as always, the context of Rule 410. I have always handled any plea discussions in confidence and plan on doing that in this case. If there is interest in those discussions on your side, please let us know. Also happy to do that over a Teams call if easier/more productive.

Thanks -

Rob



Robert E. McGuire
Acting United States Attorney
Middle District of Tennessee
719 Church Street, Suite 3300
(615) 736-5151